

Denise Carlon, ESQUIRE  
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Attorneys for MTGLQ Investors, LP

IN THE MATTER OF:

Dwight Eric Holmes

DEBTOR,

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

CHAPTER 13  
CASE NO. 17-12144 JKS

**NOTICE OF OBJECTION**

The undersigned, Denise Carlon, Esquire For KML Law Group, P.C., attorney for Secured Creditor **MTGLQ Investors, LP**, the holder of a Mortgage on the debtors' premises at **376 Hawthorne St Orange, NJ 07050** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. Mortgage arrears on Debtor's residential mortgage loan, which loan is secured by a mortgage held by Movant on Debtors' principal residence at 376 Hawthorne Street, Orange, NJ 07050, as will be set forth in the Proof of Claim that Movant intends to file by the deadline for filing claims established by the Court, are estimated to be \$56,415.14.
2. Debtor's plan incorrectly lists the creditor as Wells Fargo; secured creditor is MTGLQ for payment in the amount of \$53,071.12 towards the arrearage claim of the Movant.
3. Debtor's Plan understates the amount of the Movant's claim by \$3,344.02, and does not provide sufficient funding to pay said claim including present value interest.
4. Debtor does not propose to make regular post petition payments in accordance with the terms of the note and mortgage in violation of 11USC 10322(b)(2).
4. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Movant.
5. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/ Denise Carlon, Esquire  
Denise Carlon, ESQUIRE  
Attorney for MTGLQ Investors, LP

Dated: May 18, 2017